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ANNUAL MONITORING REPORT - EAST SAN JOAQUIN WATER QUALITY COALITION

The Central Valley Regional Water Quality Control Board (Water Board) staff has reviewed the Annual Monitoring Report (AMR) for the East San Joaquin Water Quality Coalition (Coalition) submitted on 1 April 2005. This AMR was submitted by the Coalition to meet the conditions of the Monitoring and Reporting Program (MRP) Order No. R5-2003-0826 for Coalitions under Resolution No. R5-2003-0105.

The attached review summary includes additional comments, suggestions and clarifications of requirements that are part of the MRP, many of which have already been provided to the Coalition in communications with Water Board staff. It has been noted that as a result of the communications, many of the items discussed in the AMR memorandum (attached) have already been addressed by the Coalition.

Follow-up to any exceedances require that communications to the Water Board include actions taken to address the exceedances. Some of these actions may be assessment and implementation of management practices, secondary monitoring to identify the source, pesticide use evaluations and other activities undertaken to address water quality. To date, all appropriate initial information regarding follow-up monitoring and test results has been submitted when sample toxicity was indicated. However, appropriate follow-up information regarding pesticide use, source identification, management practice implementation and other management activities have not been communicated to the Water Board.

At a minimum, the Coalition should begin collecting this type of detailed information for the surrounding land areas and identifying possible sources for water quality exceedances for the following sites: August Road Drain Upstream of Crows Landing Bridge and Duck Slough @ Gurr Road and the Merced River at Santa Fe Drive. These sites exhibited water quality exceedances for Chlorpyrifos, *E.coli*, TDS and conductivity, as indicated in the attached staff review. Other pesticides, such as Dimethoate, Trifluran and Esfenvalerate were also detected, although the levels were below Water Quality Objectives. This is sufficient information to warrant a review of local management practices.

California Environmental Protection Agency

The attached review of the Coalition AMR indicates that the Coalition will also need to take into consideration the following specified items:

- Monitoring reports shall contain the raw data sheets for all analyses including *E.coli* and Toxicity analyses.
- Flow/discharge measurements are required to be taken at each site for each event.
- Communication reports shall be submitted for exceedances of all water quality parameters, including pH, DO, coliform, pesticides and other parameters that have associated Basin Plan objectives.
- Quality control samples, analyses, and frequency should be consistent with the Coalition's QAPP requirements.
- Monitoring for irrigation season does need to start with the first month of irrigation and continue monthly through to the last. This will provide for a better characterization of the hydrologic trends of that season, and is consistent with Conditional Waiver requirements.

The Conditional Waiver also requires that, all major drainages must be part of baseline monitoring. At least 20% of the intermediate drainages must be monitored during the first year and the second 20% the second year, etc. By **1 November 2005**, please submit a list that identifies the drainages as baseline, intermediate, and secondary intermediate and that also identifies appropriate monitoring sites. Please also review the monitoring sites for areas that may not be well represented in the current MRP Plan.

The Water Board would like to again acknowledge the timely submittal of the 2004 AMR by the Coalition, and recognizes the extensive work involved. We are confident that continuation of this level of collaboration will help protect water quality and ensure success for the Coalition approach being utilized in the Irrigated Lands Conditional Waiver Program.

If you have any questions or comments, please contact Dana Thomsen at 916-464-4847, or dthomsen@waterboards.ca.gov.

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Enc: Response To Review of Annual Monitoring Report
MLR:mlr

MLR/w/IrrigatedLands/Coalitions/EastSanJoaquin/AMR/CoverLetter_ESSJ_AMRReview

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